



PARTNERS

Phillip C. Hamilton, Esq.
 Lance A. Clarke, Esq.
 Jason M. Clark, Esq.
 William F. Guilford, Esq.

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF NEW YORK

-----	X
UNITED STATES OF AMERICA	:
	:
Plaintiff,	: 1:20-CR-00064
- v. -	:
	:
TREVOR BODDEN	
Defendant	
-----	X

I. Background

“My mother beat me all of the time because she couldn’t deal with my mental health problems; but I still loved her.”

These are words no adult should have to say; and no child should have to experience. However, these are the words used by Trevor Bodden when describing his childhood. His upbringing was one of suffering, pain, and trauma. Trevor’s father left his family when Trevor was 2 years-old and never looked back. Heartbroken and defeated, Trevor’s mother began to abuse alcohol and narcotics. This behavior led to the lack of consistent employment, and Trevor and his siblings being evicted from multiple apartments, sleeping at random acquaintances homes, and living in shelters.

Due to her alcohol and substance abuse, Trevor and his siblings were largely unsupervised during childhood leaving them often to fend for themselves. Frequently there was no food in the home resulting in he and his siblings eating bread with syrup and grits to feed themselves. And then there



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was the abuse. Trevor recalls being constantly cursed at, and beat with electrical cords, wires, and spoons by his mother.

Trevor often sustained bruises from the abuse, and routinely lied to school officials and the New York City Administration for Children's Services regarding the abuse. Trevor recalls being beat more than his siblings due to what he believes was his diagnosis of Attention-Deficit Hyperactivity Disorder (ADHD) which caused him to be “hyper all of the time.” He recalls his mother making fun of him for having special needs and becoming upset that he was often “too hyper.” He recalls hiding from his mother under the bed when “she was in one of her moods” to avoid being smacked, pushed, or yelled at. However, Trevor was not the only person experiencing abuse in the home. Trevor’s mother was consistently in abusive relationships. As a child Trevor witnessed his mother being punched, kicked, and one time her head being pushed into the oven while he was crying and screaming for her boyfriend to stop. At the age of 12 Trevor had enough. Tired of watching his mother being abused, tired of being abused by his mother, tired of feeling tired all the time due to his medication. At age 12 Trevor attempted suicide and stopped taking his medication; and with no present parent guiding him correctly, he stayed off it.

Off his medication, hating his father, and resenting his mother, Trevor made decisions that were counterproductive. Decisions he acknowledges were wrong, and punishments he acknowledges were deserved. But what seemed like a common theme in Trevor’s life, not all punishments were deserved.

II. Wrongfully Incarcerated

An innocent man spent over five years, in one of America’s most infamous jails, for a crime he did not commit.

In August of 2010, at the age of 19, Trevor was arrested for murder¹. He was arraigned, remanded, and taken to Rikers Island where he stayed for over five years. For over five years, 1,948 days, Trevor remained on Rikers Island for a crime he was innocent of. A crime where the Assistant District Attorney prosecuting the case withheld information so vital to Trevor's innocence, a mistrial was declared.

When initially arrested, Trevor's co-defendants identified the actual shooter as "X". X was currently being prosecuted by the Queens District Attorney office (the same District Attorney's Office prosecuting Trevor) for a homicide that occurred less than 48 hours after the incident Trevor was charged for. The gun allegedly used in the homicide X was charged with, was the same gun used in the homicide Trevor was currently charged with. This information was not disclosed to the defense until jury selection.

During jury selection the District Attorney's office turned over a Complaint Follow-Up Report and Ballistic Report which indicated that the weapon used in the homicide for which Trevor was charged, was used in a different shooting, by a different shooter. The shooting X was charged with it.

The Court declared a mistrial. Yet, Trevor remained incarcerated after the mistrial for more than a year before his second trial.

During Trevor's second trial it was revealed that the decedent's phone was found in X's possession when X was arrested. The eyewitness testimony against Trevor was also proven to be false. The jury returned a verdict acquitting Trevor of all charges on December 8, 2015.

¹ *Indictment# 2047/2010, Supreme Court, Queens County.*

After 5 years Trevor was finally exonerated. But he was not free to go. Trevor had a pending felony assault charge stemming from his arrest on the murder charge. While arrested, an officer injured himself while roughly arresting Trevor. An arrest that resulted with Trevor requiring medical attention.² Trevor was told he would now have to go to trial a third time. This time for Assault. After spending over five years in jail, for a crime he did not commit, Trevor agreed to plead guilty to misdemeanor assault and was sentenced to one year in jail. A sentence responsible for half of Trevor's criminal history points.³ Trevor currently has a lawsuit pending against the City of New York for malicious prosecution and false imprisonment.⁴

III. Family Life

My biggest fear is losing time with my children and not being able to be there with them.

In 2014, while Trevor was incarcerated for the murder charge, his mother passed away due to a brain hemorrhage. Despite the abuse experienced from his mother, according to Trevor, “it killed me when she died, and I couldn’t even go to the funeral.” Because as Trevor said to defense counsel, “at the end of the day she was my mother, and I know she loved me. That’s more than I can say about my father.” Trevor may be correct.

After years of resentment and anger towards his father for abandoning him, Trevor mustered up the strength, swallowed his pride, and reached out to his father. Now that he was a father, Trevor

² Mr. Bodden was treated at Peninsula Hospital 51-15 Beach Channel Dr, Far Rockaway, NY 11691. The facility closed in 2012. The storage facility where the medical records may be held have not replied to defense counsel as of the writing of this memo.

³ PSR. Par 78.

⁴ *Bowen v City of New York*, 702365/2017

wanted his children to have a relationship with their grandfather and hoped he could have one with his father as well. His father did not share the same sentiments. Trevor sent message after message to his father on social media; pictures of himself, pictures of his children; begging his father to respond. After multiple messages, his father never replied and eventually blocked Trevor from contacting him.

With his mother passing away, and his father wanting nothing to do with him, Trevor's core support group is his fiancé and his children who he describes as "the only reason I'm alive." Trevor has been an amazing father to his children, especially given the lack of examples he had in his own life. Growing up never feeling loved by his parents has miraculously made Trevor the best father he can be. Trevor's life revolves around his children. He is present to assist with homework assignments, school projects and spends as much time as he can with them to ensure "they won't end up like me."

According to Trevor, "out of everything bad that has happened to me in my life, my biggest fear is losing time with my children and not being able to be there with them. I can't do that to them." His fiancé Simone describes him as an "amazing" father and an "asset to the household." According to Simone, without Trevor, she would not know how she could afford to care for their daughter as Trevor provides childcare and financial support for their daughter. She expresses how she "loves to see them together, especially knowing what he went through growing up."

IV. Mental and Emotional Health

"I have to get right for my kids."

Trevor has suffered from depression and anxiety since he was a child. According to Trevor, "I always knew something was wrong with me, I was always sad and angry." At age 7 he was diagnosed

with ADHD and depression. Due to his special needs, he was unable to focus while in school and was placed into special education programs and was often physically restrained by teachers. He was prescribed, and took, Ritalin and other various medications for ADHD until he was 12 years old when he stopped taking the medication because it made him "feel drowsy and lazy."

Shortly after Trevor discontinued his medication, Trevor attempted suicide at the age of 12. Trevor remembers fastening a belt around his neck and beginning to pull the belt tighter. Fortunately, when Trevor began to tighten the belt around his neck he fell to the ground and hit his head. This caused him to release the pressure of the belt around his neck. Trevor believes that fall saved his life. Unfortunately, deep depression and suicidal thoughts have always haunted Trevor for most of his adult life, feelings Trevor states were exasperated during his time on Rikers Island.

Studies have shown that men "still find it difficult to seek psychological counseling when confronted with mounting emotional distress."⁵ Too often men do not share their feelings and never get the mental health help they may desperately need. Growing up in a culture of "manning up" and "just handle it" has created a society where men are afraid to ask for help in fear of looking weak. Fear of being judged. Fear of not being a "real man." Recently Trevor decided he would no longer subscribe to this way of thinking because he "had to get right for his children." Being a good a father was more powerful than Trevor's pride. As a result Trevor voluntarily began mental health counseling and continues to attend virtual sessions. Trevor states that he still has not found "who he is yet," but he knows he is "better than who I was in the past."

⁵ <https://www.dallasbehavioral.com/blog/mens-mental-health-its-okay-not-okay>



Trevor continues to find "himself to this day." Now that he has distanced himself from people he once associated with, he began to feel lonely, and complained about not "having anyone to talk to anymore." This caused Trevor to become "depressed" and in a "dark space." A place Trevor is familiar with, but a place he has finally allowed himself to be helped with. Counseling, work, and family life have now filled that void. Trevor is doing well in his treatment and boasts how it has helped him "cope better and do better."

V. Criminal Conduct

Mistakes he understands have not only affected him, but the people he loves as well.

While incarcerated Trevor met people who he thought were his friends. People who protected him when he was a scared, skinny, 19-year-old charged with murder, housed amongst grown men. People who became like family; people who Trevor decided to make foolish mistakes with. Mistakes he understands have not only affected him, but the people he loves as well. While supportive of Trevor, his fiancé Simone is upset Trevor "would allow himself to be put in this situation" telling defense counsel "him staying in contact with people he was incarcerated with got him in this mess." Though upset, she is strongly convinced that he is on his way to becoming a new man. I agree.

VI. Justification for a Non-Guideline sentence

Apologies become meaningless if the initial conduct has not changed.

Mental health and lack of employment are some of the leading causes of recidivism. According to Economist Jennifer Doleac, "those who are employed are less likely to reoffend, and

this correlation has led many to think that increasing access to jobs could be the key to reducing recidivism.”⁶ This is true, poverty can be correlated to many of the issues that bring most of us into this courthouse. But only by addressing the cause of the problem, do we stand a chance of preventing and/or reducing it. Trevor is ahead of the game.

Apologies become meaningless if the initial conduct has not changed. While Trevor is extremely apologetic for his behavior, he has taken the necessary steps to prove to this Court that he is in fact also rehabilitated, understanding that evidence of rehabilitation “is clearly relevant to the selection of an appropriate sentence here.”⁷ What better example is there than to provide “the most up-to-date picture of [ones] history and characteristics” as they would apply to § 3553(a)(1) than an accounting of what they have accomplished since the beginning of their criminal case.⁸

Trevor has been employed at City Harvest for over 4 months where he is responsible for packaging food to distribute to homeless shelters, churches, and other institutions providing for people in need. (Please see Exhibit A). Two of Trevor’s major goals have always been to move out of his fiancé’s mothers’ home to raise his children in his own apartment, and increase his credit score. Trevor has accomplished both. After weeks of saving their paychecks, Trevor and his fiancé saved enough money to rent their own apartment; a first for Trevor. (Please see Exhibit B) Understanding the additional financial responsibilities of having your own apartment, Trevor recently got a second job working in the packaging department at Amazon to ensure he is best prepared to take care of his family (Please see Exhibit C). Trevor even managed to get his credit score above a 750-a personal accomplishment of his he was so proud of he requested it be put in this memo. (Please See Exhibit D).

⁶ <https://econofact.org/can-employment-focused-reentry-programs-keep-former-prisoners-from-being-reincarcerated>

⁷ See *Pepper v. United States*, 562 U.S. 476 (2011)

⁸ *Id.* At 492.



While the above-mentioned things are great achievement in their own respect, they would mean little if Trevor was not working on his mental health. Trevor understands this. He is still enrolled at New York Psychotherapy and Counseling Center seeking to deal with his mental health while managing two jobs and parenthood. (Please see Exhibit E)

It can become easy to get stuck in a place of self-pity and misery when experiencing the trauma's Trevor has endured since he was a child, but as self-help writer, Edmond Mbiaka once said, "It is your responsibility to pull yourself up if you find yourself at the bottom, instead of waiting around and expecting others to come to your rescue."

This could not be truer when speaking of Trevor. He has pulled himself up from the trenches and is focused on being the father he always wished he had. It is because of this; we humbly ask this court to sentence Trevor to a sentence of time served with supervised release, and allow him to continue on the amazing path he has put himself on. As The Honorable Judge Gleeson once stated, while imprisonment may be necessary in some cases, courts should not lose sight of the fact that in the extra months and years a person is incarcerated, children grow up; loved ones drift away; employment opportunities fade; parents die."⁹

VII. Conclusion

Redemption is always possible if you are committed to it.

Trevor is someone who society would benefit from not sending to prison as he is a living example of the power of human resolve when put in a position to succeed. He is a hardworking man; a good father; and role model for younger men on what you can become when you make an effort to do

⁹ *United States v. Diaz*, No. 11 Cr. 821 (JG), 2013 WL 322243 (E.D.N.Y. Jan. 28, 2013).



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what is right. Writer Greg Boyle once said, “Redemption is the measure of a civilized society.” This is true as in a civilized society we understand that though you may err, fail, and fall, redemption is always possible if you are committed to it. Trevor is committed to his redemption; and with his current approach to life, his family support, and stable housing and employment, he will undoubtedly succeed. (Please see Exhibit F.) A part of the road to redemption is not only helping yourself, but helping others avoid the mistakes you’ve made. Because of this, Trevor currently volunteers at “Connect a Million Youths” where he speaks to young men about the pitfall and dangers of bad association, the necessity of education, and striving to live a life you and your family can be proud of. (Please see Exhibit G) We as a society need the Trevor’s of the world to show us what one can do when extended compassion and an opportunity to thrive. It is because of this we implore this Court to sentence Trevor to time served with a term of supervised release.

A sentence of time served with supervised release is one that would not only promote respect for the law, but for someone like Trevor who is trying so hard, and succeeding, to turn his life around; someone who has accepted responsibility for their actions, someone who is trying to affect change in his community, and whose life story and experiences shine light on why he may have committed the offenses charged, it is a sentence that is sufficient but not greater than necessary to achieve the true goals of sentencing under 18 U.S.C. § 3553(a).

We thank the court in advance for whatever leniency and mercy afforded.

Date: June 9, 2021

cc: AUSA Alicia Washington (ECF)

Respectfully,

Lance A. Clarke

Lance A. Clarke, Esq.

EXHIBIT A

to FILE DEF. LOCK Docu No 021
B10 009270 000133 0000210033 1

Earnings Statement

CITY HARVEST, INC.
6 EAST 32ND STREET 5TH FLOOR
NEW YORK, NY 10016

Period Beginning: 05/08/2021
Period Ending: 05/21/2021
Pay Date: 05/26/2021

Filing Status: Single/Married filing separately
Exemptions/Allowances:
Federal: Standard Withholding Table

TREVOR BODDEN

APT 3.0
BROOKLYN NY 11213

Earnings	rate	hours	this period	year to date
Regular	17.2500	33.50	577.88	2,591.82
Sick	17.2500	4.00	69.00	69.00
Emergency Pay				1,300.00
Gross Pay			\$646.88	3,960.82

Other Benefits and Information	this period	total to date
Mcttax	2.20	
403B Eligible C	646.88	2,660.82
Totl Hrs Worked	37.50	

Deductions	Statutory	Other	year to date
Federal Income Tax	-15.13		67.69
Social Security Tax	-40.11		245.57
Medicare Tax	-9.38		57.43
NY State Income Tax	-14.09		77.69
New York Cit Income Tax	-10.56		59.39
NY SDI Tax	-1.20		4.80
403B Election	-12.94*		53.22
Net Pay	\$543.47		
Checking Acct.	-543.47		
Net Check	\$0.00		

Important Notes

COMPANY PH#: +1 646 412 0671

BASIS OF PAY: HOURLY

Additional Tax Withholding Information

Taxable Marital Status:
NY: Single
New York Cit: Single
Exemptions/Allowances:
NY: 0
New York Cit: 0

* Excluded from federal taxable wages
Your federal taxable wages this period are \$633.94

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CITY HARVEST, INC.
6 EAST 32ND STREET 5TH FLOOR
NEW YORK, NY 10016

Advice number: 00000210033
Pay date: 05/26/2021

Deposited to the account of	account number	transit	ABA	amount
TREVOR BODDEN	xxx2119	xxxx	xxxx	\$543.47

THIS IS NOT A CHECK

NON-NEGOTIABLE

6 East 32nd St
5th Floor
New York NY
10016
cityharvest.org
646.412.0600

June 2, 2021

Trevor Bodden

Apt 3.0
Brooklyn, NY 11213

Dear Trevor Bodden,

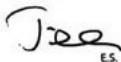
We are pleased to extend the term of your position as **Temporary Food Repack**. We trust you will treat the details of this offer with utmost confidentiality.

Your extended assignment will begin immediately with an anticipated end date of **Thursday, September 30, 2021**, with a possible additional extension. Your hourly rate will remain at \$17.25, payable in accordance with City Harvest's standard payroll practice and subject to applicable withholding taxes. **Please provide us with at least one (1) week notice if you plan to transition out of the organization.**

Please note that City Harvest is an "at-will" employer and operates under the provision that employees have the right to resign from their position at any time, with or without notice and with or without cause. We, the employer, also have the right to terminate the employment relationship at any time, with or without notice, and with or without cause.

Please sign this letter and return to Louann Gonzalez, Talent Specialist, via email at lgonzalez@cityharvest.org. In the meantime, should you have any questions, please contact Louann at (646) 412-0672.

Sincerely,



ES

Jilly Stephens
Chief Executive Officer
City Harvest, Inc.

I accept this offer and am in agreement with its terms and conditions.

Signed: _____
Name Trevor Bodden

Date: _____

EXHIBIT B

LEASE AGREEMENT

The Landlord and Tenant agree to lease the Apartment for the Term and at the Rent stated on these terms:

LANDLORD:

Tameeka Ford
Address for Notices 11233
Apartment (and terrace, if any) 1258 at Herkimer st Brooklyn NY 11233
Bank

TENANT:

Simone Leiva and Trevor Bodden
11233
1258
Herkimer st Brooklyn NY 11233

Lease date: April 12	2021	Term beginning ending	12 months May 1 April 30	2021 2022	Yearly Rent Monthly Rent Security	\$19,800 \$1650 \$1650
Broker* Grand Town Listings						

Rider Additional terms on page(s) initialed at the end by the parties is attached and made a part of this Lease.

1. **Use** The Apartment must be used only as a private Apartment to live in as the primary residence of the Tenant and for no other reason. Only a party signing this Lease may use the Apartment. This is subject to Tenant's rights under the Apartment Sharing Law and to limits on the number of people who may legally occupy an Apartment of this size.

2. **Failure to give possession** Landlord shall not be liable for failure to give Tenant possession of the Apartment on the beginning date of the Term. Rent shall be payable as of the beginning of the Term unless Landlord is unable to give possession. Rent shall then be payable as of the date possession is available. Landlord must give possession within a reasonable time, if not, Tenant may cancel and obtain a refund of money deposited. Landlord will notify Tenant as to the date possession is available. The ending date of the Term will not change.

3. **Rent, added rent** The rent payment for each month must be paid on the first day of that month at Landlord's address. Landlord need not give notice to pay the rent. Rent must be paid in full without deduction. The first month's rent is to be paid when Tenant signs this Lease. Tenant may be required to pay other charges to Landlord under the terms of this Lease. They are called "added rent." This added rent will be billed and is payable as rent, together with the next monthly rent due. If Tenant fails to pay the added rent on time, Landlord shall have the same rights against Tenant as if Tenant failed to pay rent.

4. **Notices** Any bill, statement or notice must be in writing. If to Tenant, it must be delivered or mailed to the Tenant at the Apartment. If to Landlord it must be mailed to Landlord's address. It will be considered delivered on the day mailed or if not mailed, when left at the proper address. A notice must be sent by certified mail. Each party must accept and claim the notice given by the other. Landlord must notify Tenant if Landlord's address is changed.

5. **Security** Tenant has given security to Landlord in the amount stated above. The security has been deposited in the Bank named above and delivery of this Lease is notice of the deposit. If the Bank is not named, Landlord will notify Tenant of the Bank's name and address in which the security is deposited.

If Tenant does not pay rent or added rent on time, Landlord may use the security to pay for rent and added rent then due. If Tenant falls to timely perform any other term in this Lease, Landlord may use the security for payment of money Landlord may spend, or damages Landlord suffers because of Tenant's failure. If the Landlord uses the security Tenant, shall, upon notice from Landlord, send to Landlord an amount equal to the sum used by Landlord. That amount is due, when billed, as rent. At all times Landlord is to have the amount of security stated above.

If Tenant fully performs all terms of this Lease, pays rent on time and leaves the Apartment in good condition on the last day of the Term, then Landlord will return the security being held.

If Landlord sells or leases the Building, Landlord may give the security to the buyer or lessee. In that event Tenant will look only to the buyer or lessee for the return of the security and Landlord will be deemed released. The Landlord may use the security as stated in this section. Landlord may put the security in any place permitted by law. Tenant's security will bear interest only if required by law. Landlord will give Tenant the interest when Landlord is required to return the security to Tenant. Any interest returned to Tenant will be less the sum

Landlord is allowed to keep for expenses. Landlord need not give Tenant interest on the security if Tenant is in default.

6. **Services** Landlord will supply: (a) heat as required by law, (b) hot and cold water for bathroom and kitchen sink, (c) use of elevator, if any, and (d) cooling i, 'central air conditioning is installed. Landlord is not required to install air-conditioning. Stopping or reducing of service(s) will Plot be reason for Tenant, to stop paying rent, to make a money claim or to claim eviction. Tenant may enforce its rights under the warranty of habit-ability. Damage to the equipment or appliances supplied by Landlord, caused by Tenant's act or neglect, may be repaired by Landlord at Tenant's expense. The repair cost will be added rent.

Tenant must pay for all electric, gas, telephone and other utility services used in the Apartment and arrange for them with the public utility company. Tenant must not use a dishwasher, washing machine, dryer, freezer, heater, ventilator, air cooling equipment or other appliance unless installed by Landlord or with Landlord's written consent. Tenant must not use more electric than the wiring or feeders to the Building can safely carry.

Landlord may stop service of the plumbing, heating, eleva- tor, air cooling or electrical systems, because of accident, emergency, repairs, or changes until the work is complete.

If Landlord wants to change a person operated elevator to an automatic elevator, Landlord may stop service on 10 days' notice. Landlord will then have a reasonable time to begin installation of an automatic type elevator.

7. **Alteration** Tenant must obtain Landlord's prior written consent to install any paneling, flooring, "built in" decorations, partitions, railings, or make alterations or to paint or wallpaper the Apartment. Tenant must not change the plumbing, ventila- ting, air conditioning, electric or heating systems. If consent is given, the alterations and installations shall become the property of Landlord when completed and paid for. They shall remain with and as part of the Apartment at the end of the Term. Landlord has the right to demand that Tenant remove the alterations and installations before the end of the Term. The demand shall be by notice, given at least 15 days before the end of the Term. Tenant shall comply with the demand at Tenant's own cost. Landlord is not required to do or pay for any work unless stated in this Lease.

If a lien is filed on the Apartment or Building for any reason relating to Tenant's fault, Tenant must immediately pay or bond the amount stated in the Lien. Landlord may pay or bond the lien if Tenant fails to do so within 20 days after Tenant has notice about the Lien. Landlord's costs shall be added rent.

8. **Repairs** Tenant must take good care of the Apartment and all equipment and fixtures in it. Landlord will repair the plumbing, heating and electrical systems. Tenant must, at Tenant's cost, make all repairs and replacements whenever the need results from Tenant's act or neglect. If Tenant fails to make a needed repair or replacement, Landlord may do it. Landlord's reasonable expense will be added rent.

9. **Fire, accident, defects, damage** Tenant must give Land- lord prompt notice of fire, accident, damage or dangerous or defective condition. If the Apartment can not be used because of fire or other casualty, Tenant is not required to pay rent for the time the Apartment is unusable. If part of the Apartment can not be used, Tenant must pay rent for the usable part. Landlord shall have the right to decide which part of the Apartment is usable. Landlord need only repair the damaged

*If no broker, insert "None."

EXHIBIT C

QPK 030416 129900 2523 0000222920 1

Earnings Statement

23684-0003

AMAZON.COM SERVICES, LLC
 ATTN: AMAZON PAYROLL
 202 WESTLAKE AVE N
 SEATTLE, WA 98109

Period Beginning: 05/09/2021
 Period Ending: 05/15/2021
 Pay Date: 05/21/2021

Filing Status: Single/Married filing separately
 Exemptions/Allowances:
 Federal: Standard Withholding Table

TREVOR BODDEN**BROOKLYN NY 11223**

Earnings	rate	hours	this period	year to date
Regular	17.7500	37.02	657.11	657.11
Personal Time	17.7500	.10	1.78	1.78
Shift Pay	2.4001	37.12	89.09	89.09
Gross Pay			\$747.98	747.98

Other Benefits and Information	this period	total to date
Group term Life	0.28	0.28
Personal Balnce	8.80	
Pp Pto Earned	8.90	
Pp Vac Earned	0.58	
Tot Work Hours	37.02	
Vacation Balnce	0.58	
Pp Pto Earned		3.69
Pp Vac Earned		1.54
Paid Pers Time		3.69
Vacation Bal		1.54

Deductions	Statutory	this period	year to date
Federal Income Tax		-56.96	56.96
Social Security Tax		-46.39	46.39
Medicare Tax		-10.85	10.85
NY State Income Tax		-31.63	31.63
New York Cit Income Tax		-22.16	22.16
NY SDI Tax		-0.60	0.60
Net Pay		\$579.39	
Checking Dep.		-579.39	
Net Check		\$0.00	

Important Notes

YOUR COMPANY PHONE NUMBER IS 888-892-7180

BASIS OF PAY: HOURLY

LEGAL ADDR 410 TERRY AVE NORTH SEATTLE WA 98109

@ THE SHIFT PAY RATE MAY NOT DISPLAY CONSISTENTLY
 DUE TO CALCULATION METHOD AND ROUNDING.

Additional Tax Withholding Information

Taxable Marital Status:
 NY: Single
 New York Cit: Single
 Exemptions/Allowances:
 NY: 0
 New York Cit: 0

AMAZON.COM SERVICES, LLC
 ATTN: AMAZON PAYROLL
 202 WESTLAKE AVE N
 SEATTLE, WA 98109

Advice number: 0000222920
 Pay date: 05/21/2021

Deposited to the account of	account number	transit ABA	amount
TREVOR BODDEN	XXXXX6893	XXXX XXXX	\$579.39

THIS IS NOT A CHECK

NON-NEGOTIABLE

EXHIBIT D

3:02

LTE

AA

my.equifax.com



myEquifax™



Welcome, Trevor



This is a **VantageScore® 3.0**
credit score using Equifax data.



EXHIBIT E



New York Psychotherapy and Counseling Center

06/08/21

Lance A. Clarke, Esq.
Hamilton|Clarke, LLP
48 Wall Street
New York, NY Suite 1100
10005

Reference: Trevor Bodden (DoB: 11/17/90 ID: [REDACTED])

Dear Lance A. Clarke, Esq.

Trevor Bodden was admitted to [REDACTED]
[REDACTED] on 12/07/2020.

Trevor is diagnosed with:
[REDACTED]

Trevor attended a Psychiatric Evaluation on 02/09/2021.
Trevor is prescribed the following psychotropic medications:
No current medications

During the last two months, Trevor has attended the following services:
Individual psychotherapy sessions on 04/12/2021, 04/19/2021, 04/26/2021,
05/10/2021, 05/17/2021

These services focused on these treatment goals for Trevor:

Goal Recipient will be able to appropriately express anger and decrease the frequency of angry outbursts, thereby reducing impaired functioning in the domains of social relationships and self-control.

Goal The recipient will maintain a permanent residence.

Goal The recipient will learn social skills to strengthen interpersonal interactions with peers.

Goal Recipient will be able to identify feeling of depression, and develop strategies to effectively manage such feelings so that depression no longer impairs functioning.

Regards,

Esther Klein Winter LMSW

Esther Klein-Winter

East New York Child & Family Mental Health Center
2857 Linden Boulevard Brooklyn NY 11208
Tel: (718)235-3100 Fax: (718)277-0822

Caring for the Community for Over Forty-Five Years

EXHIBIT F

Dear Judge Donnelly,

I really don't know where to start. I read my lawyer's sentencing memo and it was one the hardest things I've ever read. It's hard reading about your life, but it also made me realize why I need to stay in counseling and why I've acted the way I acted for so long. I'm not trying to make any excuses for what I did. I know I was wrong.

I don't know how to explain it but I've never felt like I had what it takes to hold down a job, my own place and be a family man. I've tried before and it's like something always happens to mess things up.

This time has been different. I have my own apartment for the first time in my life. My child lives with me for the first time in my life. I'm working 2 jobs. I'm going to therapy. I speak to young kids in the neighborhood about not making the same mistakes I did. I'm really really trying. I KNOW I can do this now.

I've been in jail before. I know when you're in jail you have to be someone you don't want to be. Someone who is tough, someone who isn't afraid to fight, just to make sure people don't attack you all of the time. I had to be that person when I was in jail for those 5 years for a crime I didn't commit. I don't want to have to become that person anymore. I'm not that person anymore.

Everything is finally working out for me in life. I know I've made mistakes. I've been trying my best since the beginning of this case to show you that I can change. I feel changed and know I've changed. I'm asking that you please give me the opportunity to prove it to you.

Thank you,

Trevor Bodden

Simone Leiva
1258 Herkimer Street Apt. 2
Brooklyn, NY 11233

Date: June 1, 2021

Dear Your Honor,

I truly believe Trevor is a person of good moral character. I realize that might seem hard to believe, given his current circumstances, but it really is true. I have known Trevor for over five years, and in that time, I have seen him go through difficulties and depression but still managing to try to find hope and not let things get him down all the time. When I met Trevor, I was initially turned off when he told me about his past, but he was such a compassionate and sweet person that I continued to see him because I was convinced that he was a decent person at the core. He has such a good heart and is really a teddy bear deep down.

Trevor is the father of my first and only child and has really stepped up and taking this responsibility seriously. Since Trevor has taken the initiative to start therapy, overall things have been more manageable. Trevor has begun the journey of addressing his childhood trauma, and the reasons for some past decisions that he is not proud of. This has made him such a better father.

Trevor is also working two jobs, City Harvest and Amazon warehouse. Removing Trevor from our home would drastically disrupt the household and make life extremely difficult if not impossible for us. I have never had to function as a single mother and honestly speaking I do not ever want to. Trevor is the link to keeping my home in order, without him, this would bring great detriment to my family. I know what living in a single parent home did to Trevor and I do not want that for our child.

Trevor has made mistakes and he is incredibly remorseful. I know he is willing to do whatever it takes to show everyone he can make it. He really needs the opportunity to get a second chance. I recognized that Trevor broke the law. It was stupid and selfish. But he's such a better and different man now. Please allow him to continue growing and allow us to keep our family intact.

Thank you,

Simone Leiva

COURT REFERENCE LETTER

To Whom This May Concern,

My name is Ms. Timothy Robinson and proud to offer my recommendation of TREVOR BODDEN to whom I have personally known for over 20 years. His mother was a personal friend of mine.

During my relationship with TREVOR BODDEN, I have experienced an individual who shows up earlier than asked, works hard, and carries themselves in a polite, respectable manner. In addition, Trevor is a family-person who has presented himself with levelheadedness and grace. He is a loving and caring young man. I am blessed and honored to have him in my life. He is definitely a productive citizen in our society.

Please do not hesitate to contact me if you should require any further information.

Best,

Timothy Robinson, CNA/Phlebotomist (NYCHHC)
151 Navy Walk
Brooklyn, NY 11201
929-407-4768
Timmie381@gmail.com

EXHIBIT G



**Connect A
Million Youth**
Regenerating A Generation

1642 Broadway
Brooklyn, NY 11207
www.connectamillionyouth@gmail.com

June 6, 2021

To Whom It May Concern:

I am writing this character reference letter on behalf of Trevor Bodden. Mr. Bodden is a highly intelligent, committed and industrious young man, who is committed to improving his community and being of service to his fellow man.

As the Vice President of Connect A Million Youth and the Youth President of the United Goodwill Temple Community Church, Inc., I work with many young people and can honestly say that Trevor is an outstanding individual. His work ethic embodies our purpose *"To provide an attitudinal, structural, cultural, and spiritual process by which young people gain the ability, authority, and agency to make decisions and implement change."* Mr. Bodden has participated in our Annual Youth Summit Conferences, Youth Town Hall Meetings and Holiday Toy Drives. He works diligently with the youth and is a vital part of the growth and development of many of the young people that we work with.

Mr. Bodden has been an example to not only his children and family at home but to the members of the youth department of the church that he works well with. It is my belief that Mr. Bodden has the requisite temperament and composure to handle such a responsibility that his profession carries and would hope that you take this letter in to consideration in your decision.

Thank you for your time and consideration. If you require any additional information, please don't hesitate to contact me via e-mail at MrStokes107@gmail.com or via cell (347) 351-6587.

Sincerely,

Anthony M. Stokes

Anthony M. Stokes

Vice President, Connect A Million Youth